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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268–0001

COMPETITIVE PRODUCT PRICES
EXPRESS MAIL & PRIORITY MAIL CONTRACT 6 (MC2009-31)
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2009-42

MOTION OF THE UNITED STATES POSTAL SERVICE FOR TEMPORARY RELIEF

(December 21, 2012)

In Order No. 1563, issued December 3, 2012, the Commission granted the Postal Service's request for a temporary extension of the contract in the instant docket, until January 9, 2013. The Postal Service and the customer have been working diligently to reach a new agreement to avoid any interruption in the Postal Service's ability to provide this customer access to negotiated rates. The Postal Service will be gathering signatures on the successor contract over the holidays, and expects to file with the Commission shortly after the New Year.

The Postal Service respectfully requests that the Commission grant an additional extension until January 27, 2013, when it expects the successor contract will take effect after the Commission completes its review. Thus, the proposed extension would only last for a finite and relatively short period of time. An additional brief extension would avoid any interruption in the customer's access to negotiated rates as a result of the processes that it must participate in when it does business with the Postal Service, rather than with one of the Postal Service's competitors.

In conclusion, for the reasons discussed above, and in consideration of the customers' business continuity, the Postal Service hereby moves for temporary relief to

allow the existing contract to remain on the competitive products list until January 27, 2013.

Respectfully submitted,

UNITED STATES POSTAL SERVICE By its attorneys:

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